

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

PLAINTIFF,

v.

VOLVO CONSTRUCTION EQUIPMENT
NORTH AMERICA, INC., et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:10-CV-0327-LED-JDL

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND CERTAIN DEADLINES

Plaintiff Innovative Global Systems, LLC (“IGS”), Caterpillar, Inc. (“Caterpillar”), Volvo Construction Equipment North America, Inc. (“Volvo Construction”), Volvo Trucks North America, Inc. (“Volvo Trucks”) and StarTrak Systems, LLC (“StarTrak”) (collectively referred to herein as “Parties”) jointly file this Unopposed Motion to Extend Certain Deadlines, and in support thereof, shows the Court the following:

Pursuant to the Court’s Order on Joint Motion to Extend Certain Deadlines of June 17, 2011 [D.I. 209] the deadline for the parties to comply with P.R. 4-3, exchange privilege logs and to provide information to the Court regarding proposed technical advisors is currently June 24, 2011.

The only four remaining defendants of the initial twelve in this case are Caterpillar, Volvo Construction, Volvo Trucks, and StarTrak.

The parties are in the middle of settlement discussions and therefore request an extension until July 8, 2011 to serve their respective privilege logs, comply with P.R. 4-3 and provide the Court information regarding proposed technical advisors.

This extension is not sought for delay and such an extension will allow the parties to continue their negotiations.

WHEREFORE, PREMISES CONSIDERED IGS, Caterpillar, Volvo Construction, Volvo Trucks, and StarTrak respectfully request the Court enter an order granting an extension of the above deadlines until July 8, 2011.

DATED: June 24, 2011

Respectfully submitted,

/s/ Michael T. Cooke (with permission)

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Respectfully submitted,

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AMERICA, INC. AND VOLVO TRUCKS
NORTH AMERICA, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of June, 2011, I electronically filed the foregoing document with the clerk of the Court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Gary J. Fischman
Gary J. Fischman